

United States District Court
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

Case Number:

V.

10. ms. Sub. SSN

LAURA VALDOVINOS MANCILLA

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 21, 2010, in Ramsey County, in the State and District of Minnesota, defendant(s) re-enter and was found in the United States without having obtained the consent of the Attorney General of the United States, or his successor, the Secretary of Homeland Security.

in violation of Title 6, United States Code, Section(s) 202, 557 and Title 8 United States Code, Section(s) 1326(a), and 1326(b)(2).

I further state that I am a(n) Deportation Officer and that this complaint is based on the following facts:
SEE ATTACHED AFFIDAVIT

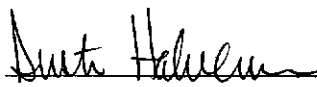
Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

12/29/10
Date

The Honorable Janie S. Mayeron
UNITED STATES MAGISTRATE JUDGE

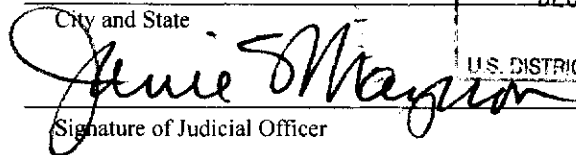
Name & Title of Judicial Officer


Signature of Complainant

Dustin Halverson
BICE

St. Paul, MN

City and State


Signature of Judicial Officer

SCANNED

DEC 29 2010

U.S. DISTRICT COURT ST. PAUL

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

AFFIDAVIT OF Dustin Halverson

Dustin Halverson, being duly sworn, deposes and states as follows:

1. I have been employed with Immigration and Customs Enforcement (ICE) within the Department of Homeland Security (DHS) since April 2007. In August 2009, I was promoted to Deportation Officer.
2. As a Deportation Officer, my duties and responsibilities include overseeing the removal proceedings of aliens. I am also responsible for reviewing alien files (commonly known as "A files") in connection with the detention and release of aliens in ICE custody.
3. This Affidavit is based on my training, experience, personal knowledge, discussions with other law enforcement officers and agents directly involved in this investigation, and my review of official reports and documents related to this investigation.
4. This Affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant, and therefore contains only a summary of relevant facts. Based upon all the facts and information set forth in this Affidavit, I believe that probable cause exists to support that, on or about December 21, 2010, in Ramsey County, in the State and District of Minnesota, Laura VALDOVINOS-Mancilla unlawfully reentered and was found in the United States after having been previously removed, without having obtained the consent of the Attorney General or his successor, the Secretary of Homeland Security, to re-apply for admission to the United States, and that VALDOVINOS-Mancilla's removal was subsequent to a conviction for commission of an aggravated felony, in violation of Title 8, United

States Code, Sections 1326(a) and 1326(b)(2) and Title 6, United States Code, Sections 202 and 557.

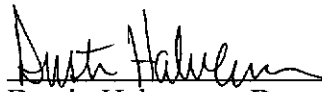
5. On December 8, 2010, the DHS Law Enforcement Support Center (LESC) received a tip via telephone reporting three individuals illegally residing in the United States. The caller referenced a Laura VALDOVINOS with an address in Minnesota as one of the individuals in the United States illegally.
6. On December 20, 2010, the LESC referred the tip to the ICE office, in Bloomington, Minnesota. Through record checks, ICE identified Laura VALDOVINOS as Laura VALDOVINOS-Mancilla maintained in ICE records. Laura VALDOVINOS-Mancilla was identified as having been previously removed from the United States as an aggravated felon.
7. On December 21, 2010, VALDOVINOS-Mancilla was located and arrested in Ramsey County, in the State and District of Minnesota, by members of the St. Paul ICE Fugitive Operations Team. VALDOVINOS-Mancilla was arrested for violation of the Immigration and Nationality Act (INA).
8. On February 10, 2000, VALDOVINOS-Mancilla was convicted of the felony offense of Conspiracy to Distribute and to Possess with Intent to Distribute Methamphetamine, in the United States District Court, District of Minnesota, at St. Paul, Minnesota in violation of Title 21 U.S.C. 846. On February 10, 2000, VALDOVINOS-Mancilla was sentenced to 1 year and 1 day imprisonment.
9. VALDOVINOS-Mancilla's immigration file indicates that she has been previously arrested and removed from the United States on three occasions. On February 10,

1999, VALDOVINOS-Mancilla was removed from the United States to Mexico at the Nogales, AZ port of entry. On February 18, 2000, VALDOVINOS-Mancilla was removed from the United States to Mexico at the Laredo, Texas port of entry. On April 19, 2000, VALDOVINOS-Mancilla was removed from the United States to Mexico at the El Paso, Texas port of entry.

10. Law enforcement has confirmed through fingerprints and photographs contained in VALDOVINOS-Mancilla's criminal history and immigration file that the individual named Laura VALDOVINOS-Mancilla referenced in those records is, in fact, the same person who is currently in ICE custody and was encountered on December 21, 2010, by the St. Paul ICE Fugitive Operations Team.
11. My investigation has revealed that VALDOVINOS-Mancilla is a citizen and national of Mexico who makes no claim to United States citizenship or lawful permanent residence status in the United States.
12. VALDOVINOS-Mancilla has admitted that since her removal from the United States on April 19, 2000, that she reentered the United States without applying for, nor receiving, permission to enter the United States from the Attorney General, his successor, the Secretary of Homeland Security, or any other designated and authorized representative. My investigation confirms that since her removal from the United States on April 19, 2000, VALDOVINOS-Mancilla has not applied for, nor received, permission to enter the United States from the Attorney General, his successor, the Secretary of Homeland Security, or any other designated and authorized representative.

13. Based on these facts, I have reason to believe that Laura VALDOVINOS-Mancilla unlawfully reentered and was found in the United States after removal, in violation of Title 8, United States Code, Sections 1326(a) and 1326(b)(2) and Title 6, United States Code, Sections 202 and 557.

14. Further Your Affiant Sayeth Not.



Dustin Halverson, Deportation Officer
Immigration and Customs Enforcement

SUBSCRIBED and SWORN to Before Me

This 29th day of December, 2010.



United States Magistrate Judge